

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In Re Application of:)	
)	
Diane C. Thornton, et al.)	Confirmation No: 1176
)	
Serial No.: 10/729,259)	Group Art Unit: 2128
)	
Filed: December 5, 2003)	Examiner: Gebresilassie, Kibrom K.
)	
For: DRAWING CONVERSION ASSIGNMENT)	
AND MANAGEMENT SYSTEM)	Atty. Docket No.: 190250-1780

REPLY BRIEF RESPONSIVE TO EXAMINER'S ANSWER

Mail Stop: Appeal Brief-Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

Sir:

The Examiner's Answer mailed July 15, 2008 has been carefully considered. In response thereto, please consider the following remarks.

AUTHORIZATION TO DEBIT ACCOUNT

It is not believed that extensions of time or fees for net addition of claims are required, beyond those which may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required therefor (including fees for net addition of claims) are hereby authorized to be charged to deposit account no. 20-0778.

REMARKS

The Examiner has provided in the Examiner's Answer various responses to arguments contained in Applicants' Appeal Brief. Although the Examiner's Answer has added some additional remarks in response to Applicants' arguments, the substance of the rejections and the Examiner's positions have not changed. Accordingly, Applicants stand behind the arguments set forth in the Appeal Brief. In addition, Applicants address selected responses in the following.

In the Examiner's Answer, the Examiner states that claims 1-9 should be associated with physical components in order to be statutory. Page 3. In response, Applicants note that claim 1, as an example, is directed to assigning a drawing conversion job record to a draftsman so that a land base drawing file may be redrawn or transformed into a new drawing format and closed upon receipt of a close request from the draftsman. Accordingly, Applicants submit that the subject matter of independent claim 1 produces a useful, concrete, and tangible result, and therefore, the Examiner has failed to establish a basis for finding that the claim is for an abstract idea with no practical application. Accordingly, claims 1-9 are directed to statutory subject matter.

The Examiner also states that claims 19-27 are directed to non-statutory subject matter because the specification states that "computer readable medium can be, for example but not limited to, an electronic, magnetic, optical, electromagnetic, infrared or semiconductor system, apparatus, device, or propagation medium" and further states that "computer-readable medium could even be paper or another suitable medium." As stated above, the specification does not specify that a computer readable medium has

to be a propagation medium or it has to be paper. Rather, it states that computer readable medium can be a propagation medium or it could be paper, along with a variety of other forms. Claims 19-27 however recite features that preclude the medium from being construed as a propagation medium or paper. Therefore, claims 19-27 are directed to non-statutory subject matter.

Further, the Examiner alleges that the claimed feature of "assignment logic of the computer system coupled to the database and operable to assign the drawing conversion job record to a draftsman and to instruct the database to record the assignment, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the parcel of land represented by the land base drawing file" is disclosed by *Chauhan's* disclosure of a field engineer bringing up required work from a customer site, where a superior of the field engineer reviews, changes, or approves of the work order brought by the field engineer and entered to utility center software. See page 12 of Examiner's Answer. In this reading of *Chauhan*, the Examiner construes the field engineer's superior to be analogous to a draftsman. However, no where in *Chauhan* does it state that the field engineer's superior is a draftsman.

The Examiner also construes the work order described in *Chauhan* to be a drawing conversion job record. Yet, the Examiner also construes the work order to be a land base drawing file. See page 13 of Examiner's Answer. And, the Examiner also states that a blue print or electronic map is a work order. See page 13 of Examiner's Answer. Regardless, a drawing conversion job or the creation of a new drawing file

based on information from a land base drawing file is not shown to be disclosed in *Chauhan*. As such, *Chauhan* does not describe a drawing conversion management system where a workflow of redrawing a plat for a parcel of land from an old format into a new format is tracked by a drawing conversion and assignment management system, which includes creation of the land base drawing file which is to be used to in making the new drawing, receiving notification of creation of this land base drawing file, creating a drawing conversion job record, assigning the job record to a draftsman, and then receiving a request to close the job after the job is completed by the draftsman. Rather, *Chauhan* describes a process for opening, monitoring, and closing work orders from customers and not a system for converting drawings from an old format into a new format involving the work of a draftsman.

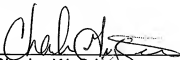
Accordingly, *Chauhan* fails to teach or suggest at least "assignment logic of the computer system coupled to the database and operable to assign the drawing conversion job record to a draftsman and to instruct the database to record the assignment, the drawing conversion job involving creation of a new drawing file based on at least information depicted in the land base drawing file and a prior plat of the parcel of land represented by the land base drawing file; and completion logic of the computer system coupled to the database and operable to receive a request to close the drawing conversion job record from the draftsman, and to instruct the database to mark the drawing conversion job record as closed to indicate that the plat has been redrawn in the new drawing format," as recited in claim 1.

Using similar reasoning, *Chauhan* does not teach or suggest the subject matter of remaining claims 2-27. For the reasons presented herein and the reasons earlier presented in the Appeal Brief, the cited references are deficient in disclosing claimed features, and the arguments set forth in the Appeal Brief still stand. The rejection of the pending claims should be overturned.

Conclusion

In summary, it is Applicants' position that Applicants' claims are patentable over the applied cited art references and that the rejection of these claims should be overturned. Appellant therefore respectfully requests that the Board of Appeals overturn the Examiner's rejection and allow Applicants' pending claims.

Respectfully submitted,

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